

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

MARLOW HENRY, on behalf of the BSC  
Ventures Holdings, Inc. Employee Stock  
Ownership Plan, and on behalf of a class of all  
other persons similarly situated,

Plaintiff,

v.

WILMINGTON TRUST, N.A., BRIAN C. SASS,  
and E. STOCKTON CROFT IV,

Defendants.

**C.A. No. 19-1925-JLH**

**PLAINTIFF’S MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AND  
CERTIFICATION OF SETTLEMENT CLASS**

Plaintiff Marlow Henry (“Plaintiff”), individually and on behalf of the Settlement Class, hereby moves pursuant to Federal Rule of Civil Procedure 23 for an order approving a settlement agreement between Plaintiff and Defendants; certifying a Class for settlement purposes; approving notice to the Settlement Class; and setting a date for a fairness hearing.

The reasons supporting this motion are contained in Plaintiff’s Opening Brief in Support of Preliminary Approval of Settlement and Certification of Settlement Class, which Plaintiff incorporates into this motion and is being filed contemporaneously. A proposed order granting this motion is attached hereto as Exhibit 1.

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